

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-CV-61444-RAR**

DOUGLAS FELLER; JEFFRY HEISE;  
JOSEPH MULL, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

ALLIANCE ENTERTAINMENT, LLC; AND  
DIRECTTOU, LLC D/B/A COLLECTORS'  
CHOICE MUSIC, CRITICS' CHOICE VIDEO,  
MOVIES UNLIMITED, DEEPPDISCOUNT, AND  
WOW HD,

Defendant.

**JOINT SCHEDULING REPORT**

Plaintiffs Douglas Feller, Jeffry Heise, and Joseph Mull (collectively, "Plaintiffs"), and Defendants Alliance Entertainment, LLC and DirectToU, LLC d/b/a Collectors' Choice Music, Critics' Choice Video, Movies Unlimited, Deepdiscount, and WOW HD (collectively, the "Defendants") submit this Joint Scheduling Report.

**REQUIRED INFORMATION PURSUANT TO S.D. Fla. L.R. 16.1(b)(2)**

Pursuant to Local Rule 16.1(a), S.D. Fla., the Parties submit the following:

**1. S.D. Fla. L.R. 16.1(b)(2)(A) - The likelihood of settlement:**

The parties have not engaged in settlement discussions but anticipate discussing potential resolution within the next 30 days.

**2. S.D. Fla. L.R. 16.1(b)(2)(B) - The likelihood of appearance in the action of additional parties:**

Plaintiffs represent that additional parties may be added, though Plaintiffs represent they are unable to forecast the likelihood of adding additional representative plaintiffs or additional

defendants at this time. Defendants reserve all potential objections with respect to the addition of other parties.

**3. S.D. Fla. L.R. 16.1(b)(2)(C), (b)(2)(D), (b)(2)(I), (b)(2)(J) - Proposals for the formulation and simplification of issues, number/timing of motions for summary judgment or partial summary judgment, requested date(s) for conferences before trial, a final pretrial conference, and trial:**

The Parties will work to simplify and narrow the issues. The parties discussed case management but disagree on a Local Rule 16.1 case management track. Plaintiffs submit this is a “standard” track, case and discovery can be completed within 269 days. Defendants submit this a complex track case in light of the fact that it is a putative class action; implicates highly technical issues; and is likely to involve significant e-discovery, significant third-party discovery, and multiple expert witnesses. Consequently, Defendants believe that 365 days from entry of the scheduling order will be needed to complete fact discovery, followed by 3 months of expert discovery. Accordingly, the Parties each propose their own case management schedule:

Event	Plaintiffs’ Proposal	Defendants’ Proposal
Deadline to join other parties and to amend the pleadings	November 19, 2024	Agreed
Fact discovery deadline	June 15, 2025	September 9, 2025
Deadline for class certification motion(s)	June 15, 2025	September 9, 2025
Expert discovery deadline	June 26, 2025	December 9, 2025
Deadline file dispositive motions	July 26, 2025	January 26, 2026
Mediation deadline	October 16, 2025	Agreed
Pretrial conference	December 2, 2025	July 2, 2026
Proposed trial date	December 15, 2025	July 26, 2026
Estimated trial length	5 days	10 days (depending on whether the case proceeds on an individual or class basis)

**4. S.D. Fla. L.R. 16.1(b)(2)(E) - The necessity or desirability of amendments to the pleadings:**

Plaintiffs do not anticipate amending the Complaint at this time.

5. **S.D. Fla. L.R. 16.1(b)(2)(F) - The possibility of obtaining admissions of fact and of documents, electronically stored information or things which will avoid unnecessary proof, stipulations regarding the authenticity of documents, electronically stored information or things, and the need for advance rulings from the Court on the admissibility of evidence:**

The Parties will in good faith attempt to obtain: (1) admissions of facts and of documents, which will avoid unnecessary proof; and (2) stipulations regarding the authenticity of documents. The Parties will seek advance rulings from the Court on the admissibility of evidence as necessary.

6. **S.D. Fla. L.R. 16.1(b)(2)(G) - Suggestions for the avoidance of unnecessary proof and of cumulative evidence:**

The Parties will in good faith to meet and confer throughout discovery to avoid the submission of unnecessary proof and/or cumulative evidence.

7. **S.D. Fla. L.R. 16.1(b)(2)(H) - Suggestions on the advisability of referring matters to a magistrate judge or master:**

The Parties do not unanimously consent to jurisdiction by the United States Magistrate Judge.

8. **S.D. Fla. L.R. 16.1(b)(2)(K)(i) – Any issues about disclosure, discovery, or preservation of electronically stored information**

Given the nature of this case, the Parties anticipate that significant e-discovery will be necessary. As such, the Parties will confer regarding the scope and extent of their e-discovery efforts in order to reach a practicable resolution.

9. **S.D. Fla. L.R. 16.1(b)(2)(K)(ii) – Any issues about claims of privilege or of protection as trial-preparation materials**

None.

10. **S.D. Fla. L.R. 16.1(b)(2)(K)(iii) – ESI Checklist**

The Parties have reviewed and used the ESI checklist to prepare this report.

11. **Any other information that might be helpful to the Court in setting the case for status or pretrial conference**

Defendant submits that discovery in this case will involve highly technical information and the involvement of multiple experts, including but not limited to forensic experts and experts concerning website functionality. Plaintiff does not believe discovery will be particularly complex given that the case involves a relatively common technology and expert involvement, if needed at all, is likely to be minimal.

Dated: September 9, 2024

Respectfully Submitted,

/s/Arun G. Ravindran

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